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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No.
19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF ROBB MCWILLIAMS
IN SUPPORT OF REORGANIZED
DEBTORS' TWENTY-SEVENTH
SECURITIES CLAIMS OMNIBUS
OBJECTION (VOLUNTARY RELEASE AND
SECURITIES ADR NO LIABILITY CLAIMS)**

Date: December 5, 2023

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Appearances
Only)

United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 I, Robb McWilliams, pursuant to section 1746 of title 28 of the United States Code, hereby
2 declare under penalty of perjury that the following is true and correct to the best of my knowledge,
3 information and belief:

4 1. I am a Partner and Managing Director at the firm of AlixPartners, LLP
5 (“**AlixPartners**”), which is an affiliate of both AlixPartners, LLC and AP Services, LLC, (“**APS**”).
6 APS was previously retained to provide interim management services to PG&E Corporation and
7 Pacific Gas and Electric Company, as debtors and reorganized debtors (collectively, the
8 “**Debtors**,” and as reorganized pursuant to the Plan, the “**Reorganized Debtors**”) in the above-
9 captioned chapter 11 cases (the “**Chapter 11 Cases**”). I submit this Declaration in support of the
10 *Reorganized Debtors’ Twenty-Seventh Securities Claims Omnibus Objection (Voluntary Release*
11 *And Securities ADR No Liability Claims)* (the “Omnibus Objection”), filed contemporaneously
12 herewith.¹

13 2. In my current position, I am responsible for overseeing the bankruptcy case
14 management component of AlixPartners’ assignment to assist the Reorganized Debtors with
15 various matters related to these Chapter 11 Cases. My areas of responsibility includes the effort by
16 AlixPartners, in coordination with the Reorganized Debtors, to review and assess the validity of
17 all claims asserted against the Debtors, other than (a) Fire Claims and Subrogation Wildfire
18 Claims, and (b) providing support with respect to Securities Claims. I am generally familiar with
19 the Reorganized Debtors’ day-to-day operations, financing arrangements, business affairs, and
20 books and records. Except as otherwise indicated herein, all facts set forth in this Declaration are
21 based upon my personal knowledge, the knowledge of other AlixPartners professionals working
22 under and alongside me on this matter, my discussions with the Reorganized Debtors’ personnel
23 and the Reorganized Debtors’ various advisors and counsel, and my review of relevant documents
24 and information. If called upon to testify, I would testify competently to the facts set forth in this
25 Declaration. I am authorized to submit this Declaration on behalf of the Reorganized Debtors.

26 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms
27 in the Omnibus Objection.

1 3. The AlixPartners team under my supervision has been actively and intimately
2 involved in the claims review and reconciliation process. AlixPartners initially assisted the Debtors
3 in the preparation of their bankruptcy schedules based on the Debtors' books and records.
4 AlixPartners is now supporting, and will continue to support, the efforts of the Reorganized
5 Debtors and their counsel to resolve disputed claims, including by formal objections as necessary.

6 4. As part of the claims review and reconciliation process, the AlixPartners team,
7 working with the Reorganized Debtors' personnel and other professionals, has identified a number
8 of filed Proofs of Claim for which Claimants have not complied with the Securities ADR
9 Procedures Order by failing to respond to offers made pursuant to the Offer Procedures of the
10 Securities ADR Procedures – even after a significant number of reminders and outreach by the
11 Reorganized Debtors and their advisors.

12 5. The Omnibus Objection is directed to Proofs of Claim identified in **Exhibit 1**
13 attached thereto, in the column headed "Claims to Be Disallowed and Expunged," and referred to
14 in the Omnibus Objection as "Voluntary Release and Securities ADR No Liability Claims."
15 **Exhibit 1** to the Omnibus Objection was prepared by the AlixPartners team under my overall
16 supervision, and I am familiar with the document, its contents, and the process under which it was
17 prepared.

18 6. The Reorganized Debtors sent each of the Claimants listed in **Exhibit 1** a
19 Settlement Offer pursuant to the Offer Procedures, and specifically the Securities Procedures at
20 Section II.A. The Settlement Offer provided each Claimant with detailed instructions on how to
21 respond to the Settlement Offer, including through the Securities Claims Settlement Portal, by
22 email, or by mail. The Settlement Offer notified each Claimant that the Securities ADR Procedures
23 Order requires the Claimant to accept, reject, or make a counteroffer by the Settlement Response
24 Deadline. After the Settlement Offers were issued, if a Claimant set forth a valid telephone number
25 in their proof of claim, AlixPartners attempted a reminder call to most such Claimants by phone
26 to notify them of the settlement offers. Of the 21 Claimants listed in **Exhibit 1**, AlixPartners was
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1 unable to reach six Claimants by phone. Each of these six Claimants received at least four
2 reminder email notifications and three also received a hardcopy mailing of the settlement offer.

3 7. Also, if a Claimant listed a valid email address on their proof of claim, AlixPartners
4 sent the Claimant an offer reminder (the “Offer Notice Reminder”) by email. AlixPartners sent at
5 least two reminder emails regarding the pendency of the settlement offers to 18 of the Claimants
6 listed in **Exhibit 1**. The three Claimants who did not receive a reminder email, received a follow
7 up phone call. Further, 12 Claimants received hardcopy mailings to inform them of their
8 outstanding settlement offers.² These reminder communications provided each Claimant with
9 detailed instructions on how to respond to the Settlement Offer, including through the Securities
10 Claims Settlement Portal, by email, or by mail. These reminder communications also informed
11 each Claimant that the Securities ADR Procedures Order requires the Claimant to accept, or reject
12 the offer, or make a counteroffer, no later than thirty-five (35) days after the mailing of the Offer
13 Notice (the “**Settlement Response Deadline**”).

14 8. In accordance with the Securities ADR Procedures Order, the response to the
15 settlement offer must be received by the Reorganized Debtors by the Settlement Response
16 Deadline. The Reorganized Debtors did not receive an acceptance, rejection, or counteroffer by
17 the Settlement Response Deadline, nor have they received any acceptance, rejection, or
18 counteroffer up until the date of the filing of this Objection, with respect to any of the Claims
19 identified on **Exhibit 1**.

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21 [Remainder of Page Intentionally Left Blank]
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26 ² Nine Claimants listed in **Exhibit 1** did not receive a hardcopy mailing because their offers were
27 already at least one year old and AlixPartners had already provided these Claimants multiple
28 reminders of the pendency of their Settlement Offers.

1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
2 and correct to the best of my knowledge, information, and belief.

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4 Executed October 24, 2023 in Dallas, Texas.

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6 /s/ Robb McWilliams
7 Robb McWilliams
8 Managing Director
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